Legislative Audit Division

State of Montana

Report to the Legislature

December 2004

Performance Audit

Transfer of Credits

Montana University System (MUS)

Montana Board of Regents of Higher Education

Transferring MUS credits is adversely affected by a decentralized management approach. This has limited the system in achieving the transferability goals initially outlined during MUS restructuring and resulted in unpredictability for students.

PERFORMANCE AUDITS

Performance audits conducted by the Legislative Audit Division are designed to assess state government operations. From the audit work, a determination is made as to whether agencies and programs are accomplishing their purposes, and whether they can do so with greater efficiency and economy. The audit work is conducted in accordance with audit standards set forth by the United States Government Accountability Office.

Members of the performance audit staff hold degrees in disciplines appropriate to the audit process. Areas of expertise include business and public administration, mathematics, statistics, economics, political science, criminal justice, computer science, education, and biology.

Performance audits are performed at the request of the Legislative Audit Committee which is a bicameral and bipartisan standing committee of the Montana Legislature. The committee consists of six members of the Senate and six members of the House of Representatives.

LEGISLATIVE AUDIT DIVISION

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December 2004

The Legislative Audit Committee
of the Montana State Legislature:

This is our performance audit of the transfer of credit process within the Montana University
System (MUS). This audit provides information on how the transfer of credit process works
among the fourteen institutions within the system. To improve predictability and consistency for
students, this report makes recommendations that the Montana Board of Regents centralize and
standardize components of this process. A written response from the Montana Board of Regents
of Higher Education is included at the end of the report.

We wish to express our appreciation to all Regents as well as MUS staff for their cooperation and
assistance during this audit.

Respectfully submitted,

(Signature on File)

Scott A. Seacat
Legislative Auditor

Legislative Audit Division

Performance Audit

Transfer of Credits

Montana University System

Montana Board of Regents of Higher Education

Members of the audit staff involved in this audit were Bridget Butler, Angela Grove, Diedra Murray, and Misty L. Wallace.

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Appointed and Administrative Officials

Introduction	In February 2001 the Legislative Audit Division provided information to several legislators concerning transferring of college credits between Montana University System (MUS) units. Although problems with transfers did not appear widespread, legislators continued to receive student complaints about timeliness of decisions and poor communication between institutions. Based on this information, the Montana Legislative Audit Committee requested a performance audit to examine the processes and procedures used for transferring student credits.
Audit Scope	Audit scope focused on the following audit objectives:

1. Determine if institutional procedures provide a predictable process for students to transfer credits.

2. Determine if the Board of Regents (Regents) - MUS transfer evaluation policies assure consistent and equitable treatment of students.

3. Determine if transferring between nursing programs can be improved.

Audit Approach Was System-Wide	Transfer of credits is intended to be a system-wide process rather than an isolated management procedure on specific campuses; therefore audit objectives and testing were directed at MUS management of the transfer of credit process as a whole. We focused on the overall framework created to manage transfer of credits. Audit work concentrated on primarily four areas of degree study: nursing, engineering, business, and education.
Conclusion: Current Process Is Not Predictable for Students	When a new MUS governance structure was implemented in July 1994, student expectations and perceptions also began to change. Students perceived they were enrolled in a coordinated and consistent statewide delivery system for higher education. Our audit work found this perception does not reflect current practice. All MUS institutions have developed independent transfer of credit processes. Campus policies and interpretation of Regents policies vary. Procedures to direct the process and ensure timely decisions for students are not in place at all institutions. Communication of methods used is not occurring on a statewide level. We found the transfer of credit process has not been standardized to reflect a

system-wide perspective. This has several inconsistencies for students including:

▶ Timeliness of transfer evaluations varied extensively. We found decisions on the acceptance or denial of credits could take place within one day or in some cases, years after the transfer.

▶ When conducting file review we found decisions on why credits did or did not transfer were often not documented. Throughout the MUS, reasons for credit acceptance or denial was only noted in eight percent of the files.

▶ We found transfer evaluation decisions in faculty advising files, advising center files, department files, registration files, and admission files. Transfer evaluations were also documented in numerous ways including faculty notes, x's or dashes on a transcript, or by inputting codes on Banner. In some cases we were unable to interpret this documentation due to faculty turnover.

Recommendation: The Regents Should Define Standard Procedures to Promote Predictability

Defined procedures for timely decisions, process documentation, and centralized student information provide more predictability for students. These procedures could focus on strengthening the administration of course transfer decisions. We found there are existing campus practices, as well as other state standards, that could be incorporated into developing these statewide procedures.

Recommendation: Management Information Needed for Regents' Decision Making

Management information is necessary to make informed decisions and provide the appropriate guidance in the transfer process. Current information collected relies upon annual institutional surveys of transfer students. Although campuses have actively sought feedback from students for these surveys, limited information is gathered. Therefore, the Regents do not have the information needed to make informed decisions on unifying the transfer process throughout the MUS. By using trend data and comparative statistics the Regents will be able to make the necessary decisions that promote system unity as well as equity for student in the transfer process.

Recommendation: Core Requirements Should Be Clarified and Monitored

The Regents adopted a policy and general education core guidelines to establish a framework of academic courses at each unit that would transfer throughout the MUS. Each campus has developed its own interpretation of this policy and procedures for transferring general education courses. This has created inconsistencies and confusion on this policy. In addition, steps have not been taken to assure all institutions have adopted or complied with these requirements. The Regents should clarify requirements in this policy and monitor compliance at the units to improve a student's ability to transfer within the MUS.

Recommendation: Policy Needed for Two-Year Credit Transfers

There is limited policy from the Regents regarding transfer of credits from two-year institutions. It is up to each institution to discern whether Regents' policies apply to two-year credit transfers. With limited Regents guidance, each program has developed independently resulting in programs with widely varying credit requirements and distinct differences in transferability of seemingly similar courses. The Regents should develop policy for transfers for two-year degrees.

Recommendation: Academic Policies for Transfer Needed

To account for limited policy guidance in certain areas, campuses have developed their own policies in the transfer process, which are not necessarily consistent. We believe the Regents should take a leadership role in promoting consistency in the transfer of credit process by strengthening their transfer of credit policies relating to outdated coursework, transfer of a GPA, and course grades.

MUS Nursing Programs Have Unique Transfer Challenges

This audit was conducted in part due to questions and concerns related to transfer of credits between MUS nursing programs. Audit findings indicated all of the review degree programs had similar issues in the areas of process controls and Regent policies. However, we found there are unique challenges to the nursing programs that require further review and more specific guidance.

Despite Standard Curriculums, LPN Transfers are Problematic

Although interviews with MUS nursing instructors indicated major differences exist between curricula offered in LPN programs, we did

not identify major differences during our review. To examine the different programs, we developed a matrix (page 36) highlighting each program curriculum. Although the matrix indicates some differences exist, overall, we found LPN curriculum does not differ considerably among programs/campuses. The curricula of the five MUS LPN programs are closely related and teach comparable content per Board of Nursing guidelines. Despite these similarities, transfer of credits does not occur as expected between LPN programs.

Number of Credits Required in LPN Programs Also Problematic

We found the number of credits required for LPN programs ranged from 45 to 70 credits. This type of credit variances impact program cost for students. If a student graduates from an LPN certificate program with 45 credits and another student graduates from another LPN program with 70 credits, the first student could pay on average approximately $3000 less.

Transfers From LPN Programs to RN Programs Also Unpredictable

Only one program (MSU-Great Falls College of Technology) has all nursing-related coursework accepted to the MSU-Bozeman RN program. This is the only program offering a "transferable" AAS degree. Although this program has lower credit requirements than three of the other LPN programs, 41 of the required 65 credits will transfer to the Bozeman RN program. The number of credits accepted from other LPN programs ranges from 0 to 12 credits.

Recommendation: MUS Leadership for Nursing Programs is Needed

Audit work concluded the majority of MUS nursing transfer issues are with the design of the LPN programs and how those program credits transfer within MUS. We believe the Regents should take a direct approach to address the current design of the LPN programs. To aid in consistency among nursing programs, LPN program standardization could be developed in the areas of minimum number of credits required, type of degree awarded, and systematically fair transfer agreements.

Chapter I - Background

Introduction

In February 2001 the Legislative Audit Division provided information to several legislators concerning transfer of college credits between Montana University System (MUS) units. Although problems with transfers did not appear widespread, MUS was planning additional improvements and process updates to strengthen controls over the process. The Legislative Audit Committee recommended continued follow-up to monitor the status of proposed changes. Periodic updates were obtained from university officials. Officials reported steps were taken by the university system to work on transfer issues including:

▸ A Higher Education Transfer 2002 Steering Committee was formed to evaluate needed changes. Twenty-seven action items were identified with half of these items being acted upon.

▸ A private consultant completed an evaluation of MUS restructuring goals. This evaluation noted policies had not been changed to address concerns with transferring students within the system and significant problems remain.

▸ Several study groups have held ongoing discussions to address program coordination and the need for a core curriculum for MUS nursing programs. No formal action had been taken.

▸ A statewide Transfer and Curriculum Guide was developed as a reference for MUS admissions and registration personnel. Timely updates were planned, but often not completed.

Legislators continued to receive student complaints on the timeliness of decisions made, conflicting information, and poor communication between institutions. Based on this information, the Montana Legislative Audit Committee requested a performance audit to examine the processes and procedures used for transferring student credits between units within the MUS.

Audit Scope and Methodology

Audit scope focused on the following audit objectives:

1. Determine if institutional procedures provide a predictable process for students to transfer credits.

2. Determine if the Board of Regents (Regents) - MUS transfer evaluation policies assure consistent and equitable treatment of students.

3. Determine if transferring between nursing programs can be improved.

Audit objectives were addressed by:

▶ Determining the extent of transfer policy development.

▶ Evaluating the consistency of policy application.

▶ Reviewing 325 student transfer files from colleges of technology and community colleges to the larger campuses, as well as those between colleges/universities.

▶ Meeting with administrative staff, faculty, and students across the state at the fourteen institutions of higher education to gather background information and review transfer activities.

▶ Identifying policy and procedures used in other states.

Only those institutions under the jurisdiction of the Regents were included in this audit. Based on this criterion, we visited three community colleges, five colleges of technology, and six four-year schools. Tribal and private colleges were not included.

The following map illustrates the MUS campus locations:

Figure 1

MUS Campus Locations

Source: Legislative Audit Division
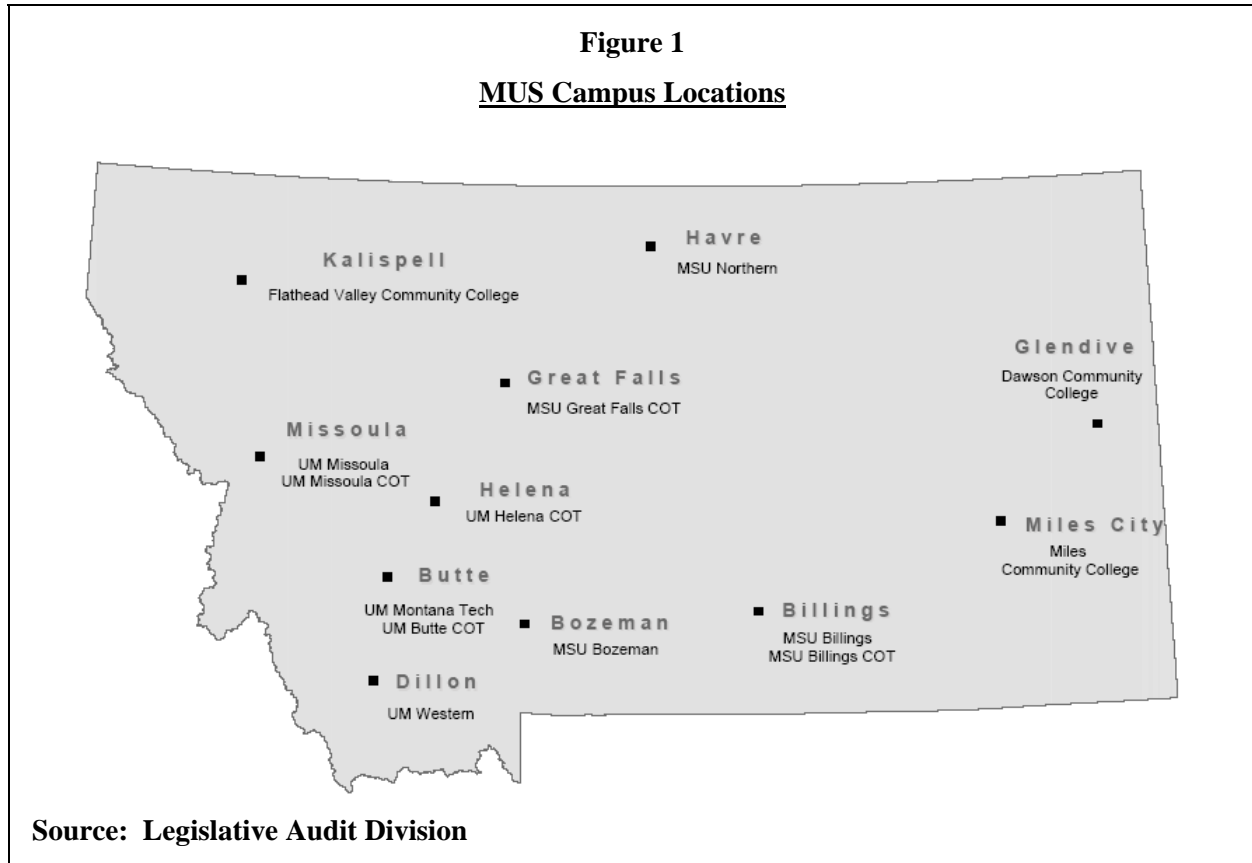
Audit testing focused on transfer activity occurring during the Fall 2003 Semester. Both in-state and out-of-state transfers were examined.

Audit Approach Focused on Four Programs

Audit planning focused subsequent audit work on primarily four areas of degree study: nursing, engineering, business, and education.

Nursing Degree Programs

The majority of legislative questions and concerns were directed at nursing programs throughout the state. In the past five years, four different groups have reviewed different concerns relating to transferring credits between nursing programs. Consultants have been hired and transfer agreements have been drafted. Ongoing discussions in numerous areas have been held including the need for a core curriculum. Despite these numerous reviews, audit planning

found significant changes and improvements have not been made in coordinating nursing programs/credit transfers.

Engineering Degree Programs

Ongoing questions on transferring engineering program credits have also been examined by the MUS. A sub-committee of the Higher Education Transfer Committee examined 100-level Chemistry courses across the state. They reported, "an accessible, up-to-date electronic transferability information system would be of value to the students and would go a long way toward solving much of the transfer problem." During audit planning we found limited steps have been taken to develop such a statewide system. Some campuses have transferability information on their websites while others do not offer that service.

Business Degree Programs

Transfer students in business programs voiced concerns that comparable courses at two-year schools were not accepted at four-year schools. Anecdotal examples included course work with the same book and same course title but credits were not accepted. Students indicated problems generally stemmed from 200-level courses. Accreditation considerations and instructor credentials were also evaluated. During planning, these examples were discussed with a number of MUS staff and it was acknowledged the transfer of credit process has not been standardized to reflect a system-wide perspective for those programs.

Education Degree Programs

During planning we reviewed procedures and processes in education degree programs for comparison purposes. Education degree programs are offered in numerous campuses across the state and could pose some transfer challenges as well.

Audit Approach Was System-Wide

Transfer of credits is intended to be a system-wide process rather than an isolated management procedure on specific campuses; therefore audit objectives and testing were directed at MUS management of the transfer of credit process as a whole.

Board of Regents

The Montana Board of Regents has constitutional and statutory responsibility and authority to supervise, coordinate, and manage the

MUS. The seven members are appointed by the Governor and confirmed by the Senate. Members serve seven-year overlapping terms. The Governor and Superintendent of Public Instruction are ex-officio members of the board. The Regents and their staff within the Office of the Commissioner of Higher Education (OCHE) have taken several steps to provide statewide criteria to manage the transfer process for students. Regents staff has facilitated statewide curriculum and transfer discussions for specific programs, such as Nursing, to assess needed changes and/or potential improvements. Data is obtained from an annual survey of students involved in the transfer process. This data is compiled and included in biennial legislative reports.

Management Memorandum: Website and Catalog Information Was Not Consistent

We identified one issue which warranted management attention, but is not a recommendation in this report. We presented this topic to institution management for consideration. We reviewed each institution's website and catalog to determine the details and depth of the transfer information that a student may access on-line as well as in written materials. Our review included evaluating both the organization and content of each website. All institutions had some level of information on the transfer process outlined on their websites and had a method for transfer students to submit questions and receive answers on-line. But other, more in-depth information was not available.

Variances in institutional catalogs were similar to those with the websites. Some institutions have more comprehensive transfer information available than others. Four campuses include information for students planning to transfer on to another institution. Three campuses provide faculty advisor information. Catalogs for "shared" campuses (Billings, Missoula, Butte) have a joint catalog/website. In some cases it is confusing to distinguish between campus practices. Overall student information on the transfer process did not provide the details needed to walk the student through the process at each campus.

Chapter I - Audit Background

Report Organization

The organization of the remaining chapters of this report is illustrated in the following figure:

Figure 2

Report Organization Overview

Chapter II MUS Transfer Activity	Chapter III A System of Controls is Needed	Chapter IV MUS Policies Should Be Clarified	Chapter V Regent Leadership Needed for Nursing Transfers
De-Centralized Management Approach. Page 11	Transfer Procedures at Institutions Vary. Page 16	Clarify and enforce the MUS general education core policy. Page 27	Transfer of Credits between nursing programs continues to be inconsistent. Page 38
Processes & Procedures Do Not Reflect Re-Organization. Page 11	Controls Do Not Ensure Timely, Documented, & Consistent Decisions. Page 16	Develop transfer of credit policies to coordinate two-year institution transfer activities specifically in relation to AAS degrees. Page 29	Develop a transfer policy for LPN programs that standardizes the number of credits required, type of degree awarded, and transfer agreements. Page 39
Unpredictability for Students. Page 11	Implement a system of controls to establish time guidelines, document decisions and standards of information for catalogs and websites. Page 19	Develop policy addressing: criteria for outdated coursework, transfer of cumulative GPA, and minimum course grades. Page 31	
	Collect transfer data to assess compliance & make informed decisions. Page 20		

Chapter Headings

Conclusions

Recommendations

Source: Legislative Audit Division

Chapter II - Montana University System (MUS) Transfer Activity

Introduction

Transfer of credit occurs when students withdraw from or complete one educational institution or program of study and enroll in another. Credits of a student's previous program can move between or within institutions and be applied to new requirements of the new institution and/or program. Student transfer frequently involves a change of "major." Often this means initial course work may bear relatively little relationship to the requirements of the new institution/program of study.

Montana Student Transfer Activity

The following chart illustrates the number of student transfers for Montana's four-year higher education institutions in Fall 2003. Of the transfer students for Fall Semester 2003, 36 percent are transferring into one of the four specified degree areas of this audit.

Figure 3

Transfers Into Four-Year Campuses
Fall 2003

Source: Compiled by Legislative Audit Division from university records.
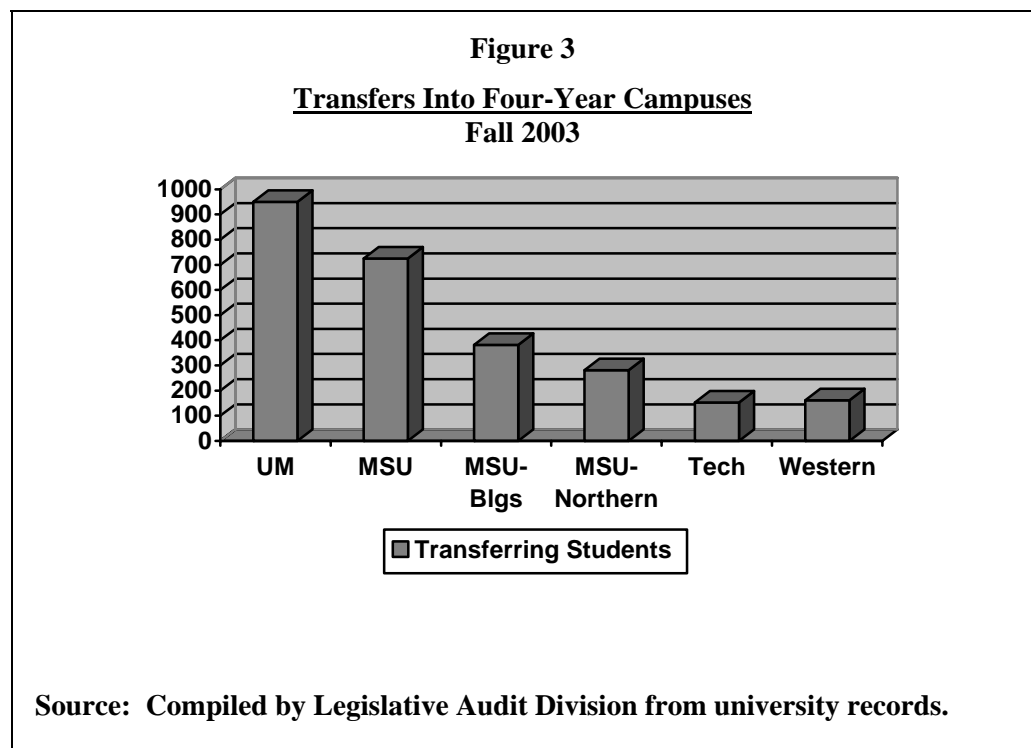
We reviewed 31 percent of the transfer student files in our designated four-degree areas for a total of 20,365 transfer credits. The following pie chart below depicts the four-degree areas and the number of files reviewed per degree area:

Figure 4

Total Transfer Student Files Reviewed By Program

☐	Business
☐	Education
☐	Engineering
☐	Nursing
☐	Unknown or Change of Major

7.00
97.00
102.00
47.00
72.00
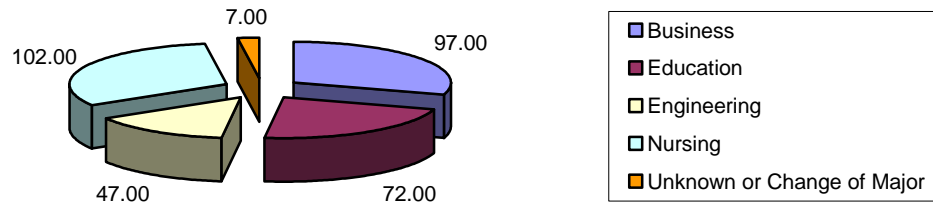
Source: Compiled by the Legislative Audit Division

Within the sample of files reviewed, 59 percent of transfer students transferred from an in-state institution and 39 percent from an out-of-state institution. The majority of transfers (181 students) were changing majors at the time of transfer. Students in our sample were also transferring from a variety of institutions. The following chart depicts the number of sampled students that transferred from each MUS campus location.

Figure 5

Number of Sampled Student Transfers From Each MUS Location
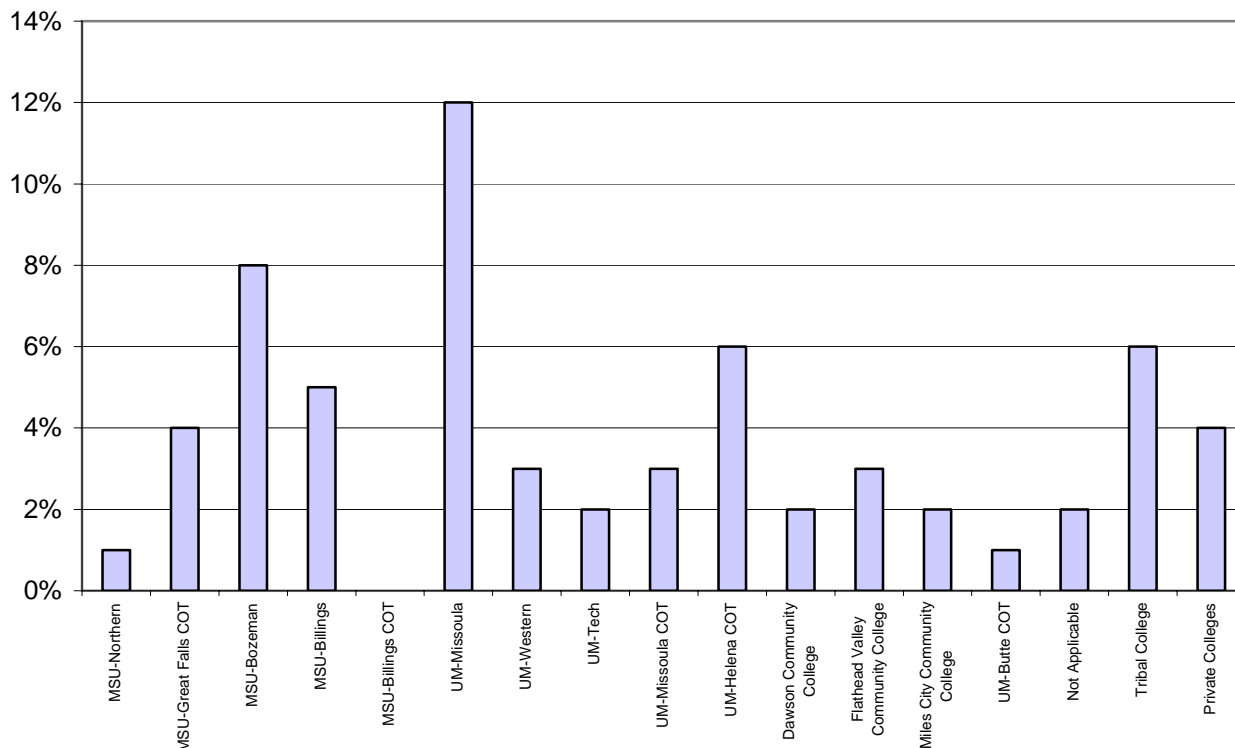
Source: Compiled by the Legislative Audit Division

Transfer Procedures Are Generally Based on Various Criteria

During our review, we found transfer procedures had been developed from various criteria.

- Accreditation standards provided the foundation for policy development and parameters for course quality. Accreditation is an indicator an institution meets certain minimum standards.
- The state educational governing body, the Regents have dictated some organizational and operational standards for institutions.
- Specific institutions define the procedural steps necessary to manage each student's activities.

In Montana, the current process has historically been defined primarily through specific institutional practices.

Chapter II – Montana University System (MUS) Transfer Activity

Impacts From MUS Re-Organization

Overall responsibility for governing the transfer of credit process was theoretically changed when a new governance structure was implemented for the MUS in July 1994. The new structure was based on a campus model with two main universities which have four affiliate campuses each (including Colleges of Technology). This re-structuring was designed to promote a single, unified system of higher education, a totally integrated approach, not merely a collection of separate institutions. One of the defined goals for this re-structuring noted in MUS documents was to include:

> "Continued development and refinement of the MUS-wide transfer and articulation system that assures students in advance of the status of individual courses within the system."

At that time, system-wide models were discussed and the statewide MUS transfer and curriculum guide was developed. Some campus administrative processes were consolidated and streamlined. Marketing was adapted to note alliances with the different campuses.

Current Process Is Not Predictable for Students

Along with these changes, student expectations and perceptions also began to change. Students perceived they were enrolled in a coordinated and consistent statewide delivery system for higher education. Our audit work found this perception does not reflect current practice. All MUS institutions have developed independent transfer of credit processes. Campus policies and interpretation of Regents policies vary. Procedures to direct the process and ensure timely decisions for students are not in place at all institutions. Communication of methods used is not occurring on a statewide level. We found the transfer of credit process has not been standardized to reflect a system-wide perspective. The conclusions and recommendations in this report outline steps needed to complete the transformation from a higher education system that consisted of independent campus processes to a more centralized transfer of credit process for the MUS.

Conclusion: The transfer of credit process is adversely affected by a de-centralized management approach. Current processes and procedures do not reflect the re-organizational structure of the MUS. This has resulted in unpredictability for students.

Chapter III - A System of Controls is Needed

Transfer Procedures Vary Extensively

Transferring credits between institutions can be a complex process. It involves many different parties and impacts future coursework and education costs for involved students. One of the major areas of our audit was to examine institutional procedures used to manage this process. In general, we found institutions were lenient in accepting credits. We also found processes at each institution varied. Some of this variation is a function of institutional size. For example, the registrar can readily handle the level of transfer activity at Dawson Community College. Larger institutions such as Montana State University-Bozeman employ four transfer evaluators to address the higher number of transfers submitted at their campus.

Other variations can be attributed to the management information systems used. The three community colleges do not use the same management information system (Banner) that is utilized by the other Montana University System (MUS) campuses. On those campuses where Banner is available, it is used differently. Banner is a commercial software application used to manage university business processes.

Some variations occurred between programs. Transfers between Education programs did have some process strengths to promote smoother transfers than other programs. We believe this was the case for several reasons. Familiarity with program designs and requirements across the MUS was higher with Education departments than with other programs. Regular communication takes place at periodic meetings with the deans of education. Despite these strengths, education students still experience some of the same problems as other students when transferring in the MUS.

We found the main reason for variation in MUS procedures is the historical autonomy and independence developed under individual institution management. Although steps have been taken since MUS re-organization to centralize areas of institutional operations, these steps have not been expanded to include standardizing evaluations of credit transfer in the MUS.

Chapter III – A System of Controls is Needed

This chapter outlines the procedures used by the university system and areas where Montana Board of Regents (Regents) controls are needed to improve MUS transfer of students' credits.

Some General Procedures Followed At Each Institution

Each institution has designed its own procedures for transferring credits. Although each design is unique, there were four primary procedures followed at each campus.

▸ Official transcripts are sent to a receiving institution's registrar or admission staff. A transcript is an official summary of a student's academic activity at each institution.

▸ Registration/admission staff evaluate submitted credits to determine if MUS general education core and specific campus requirements are met.

▸ A review of whether any credits can be applied to a declared major of study is then considered.

▸ Students can request an appeal of transfer decisions. The appeal process involves an independent review of decisions made.

Department faculty often complete the third procedure of evaluating whether credits can be applied to the student's major. On some campuses, faculty and/or department curriculum committees have made pre-determinations for accepting specific courses and delegated the case-by-case decision-making to registration staff.

On average, we found 68 percent of the credits submitted system-wide were accepted for transfer. Denials could occur for a variety of reasons; such as failing grades, remedial course work, etc. There were some variances between programs. For nursing transfer students, 63 percent were accepted. Education programs accepted 80 percent of transfer credits submitted. But acceptance of credits did not necessarily mean there were no problems.

In limited cases, students were required to take additional credits or repeat similar coursework. In other cases there was a difference in acceptance of credit for admission purposes and the applicability of credit for degree purposes. A receiving institution may have

accepted previous work, placed a credit value on it, and entered it on the transcript but that course work did not apply to a new "major". Those credits that do not apply may or may not be recorded as transferred at the receiving institutions.

Current Practices Are Problematic for Students

Varying methods of transfer evaluation created a range of treatment of transfer students across the MUS. These methods created advantages and disadvantages. Overall, we found current practices were not to the student's advantage. The current processes result in:

‣ delays in decision-making,
‣ undocumented transfer decisions, and
‣ limited information for the student.

Timeliness of Evaluation

Timeliness of transfer evaluations varied extensively. We found decisions on the acceptance or denial of credits could take place within one day or in some cases, years after the transfer. On average, we found evaluations took 73 days to complete. For nursing students, evaluations took an average of 152 days. Some campuses do not make final evaluation decisions until students are referred for upper-level course work or until a graduation checklist is being drafted years later.

Although there are no statewide guidelines, some campuses have established their own timeliness criteria. For example, UM requires transfer evaluations be completed within a two-week time frame.

Lack of Documentation Impacts Decisions and Increases Student Costs

When conducting file reviews we found decisions on why credits did or did not transfer were often not documented. Throughout the MUS, reasons for credit acceptance or denial was only noted in eight percent of the files. Without documentation, we were unable to determine if credits were applied to general education requirements, applied as elective credits, or applied to a program major. During our file review, we found one student who was required to repeat course work due to limited documentation of transfer decisions. We noted the average number of credits taken for each course is three credits. Therefore, when a student is required to repeat a course, it

could cost the student approximately $511. Actual costs to the student are dependent on specific tuition costs at the receiving institution.

In some cases, documentation was not available because those campuses did not formally document whether a credit was accepted or denied. Documentation was available for only part of the credits submitted. Interviews with institutional staff indicated there was incomplete documentation because some credits just "float" in case they need to be applied/accepted at a later date. If a student changes majors after enrollment, those "floaters" may be applied later.

When Available, Documentation Is In Several Locations and Difficult to Interpret

The location of transfer files illustrates the decentralized process. We found most institutions have no formal procedure for documenting transfer evaluation decisions in a centralized location. When documentation was available, credit transfer decisions were documented in various places across the campus. We found transfer evaluation decisions in faculty advising files, advising center files, department files, registration files, and admission files.

Transfer evaluations were documented in numerous ways including faculty notes, x's or dashes on a transcript, or by inputting codes on Banner. In some cases, we were unable to interpret this documentation due to faculty turnover. MUS staff noted appeals have come from students who were told credits would transfer and then when involved faculty were no longer on campus, there was no documentation as to whether the course would transfer or not. If information is not documented consistently, faculty discretion and turnover plays a major role on whether a student will receive transfer credit.

> **Conclusion: Transfer procedures at institutions vary. A system of overall controls does not exist to ensure timely, documented and consistent decisions.**

The Regents Should Define Standard Procedures to Promote Predictability

Defined credit transfer procedures for timely decisions, process documentation, and consistent student information would provide more predictability for students. These procedures could focus on strengthening the administration of the process rather than the criteria used in making course transfer decisions. We found there are existing campus practices, as well as other state standards, that could be incorporated into developing these statewide procedures.

At the campus level, we found several well-designed practices that could be utilized to guide the transfer process across the MUS. These practices were identified through audit work at the various MUS campuses. The practices highlighted below could be useful for providing consistency in transferring credits.

- One campus ensures consistency by having transfer evaluations completed by one program faculty and the department chair or dean reviewing/approving that evaluation.

- Four campuses use standardized campus transfer evaluation forms to itemize where courses are applied (general education core, program area and electives) and to document reasons for denial.

- Two campuses have advising centers that coordinate portions of the transfer evaluation process. One campus is utilizing an advising center with advisors assigned to specific programs; that advisor communicates regularly with program faculty and is aware of all new requirements, course equivalencies, etc. Another campus has a general advising center for all programs as well as a specific advising center for business students.

- One campus is using the Banner transfer equivalency worksheet to display incoming transfer courses and course equivalencies. Three other campuses use some components of this worksheet.

In other states, similar higher education governing bodies have adopted "guiding principles" to ensure consistency in their transfer

of credit process. In Missouri, Principles of Good Practice for Transfer and Articulation outline general guidelines such as mandating all policies and procedures should be easily understood, readily available, and widely distributed among students, faculty, and staff. Process efficiencies, predictability, and equitable treatment of students are also addressed. Other states have dictated standards with documentation, timeliness, course credits, etc. We believe the Regents should develop similar standards for Montana.

Guidelines Needed for Timeliness in Evaluations

It is generally recognized the timeliness of credit evaluations can be a serious matter for students attempting to plan their programs and choose courses at registration. Although it is understood institutional workloads fluctuate and availability of staff can adversely affect the ability to meet standard timelines, we found other states and/or university systems have endorsed time limits on completing evaluations. For example, we found guidelines for admission/registration review and department review were formally defined.

▸ Up to six weeks to assess credit in Admissions, and to send to the student a response and/or request for detailed course information if necessary.

▸ Four to six weeks for the departments to review course outlines, where required.

The Regents should establish similar guidelines for MUS institutions to ensure students receive transfer information in a timely manner.

Use of Information Systems Could Be Strengthened

Instead of relying upon handwritten faculty notes and tic marks to interpret transfer of credit decisions, we believe the Regents should direct institutions to consistently and systematically use information systems when available. The primary management information system used is Banner. Banner is an electronic information system used at 80 percent of the units. We found when Banner was used to document decisions, there was more consistency in documenting evaluation decisions. There was a considerable difference between the use of Banner at the Montana State University (MSU) and University of Montana (UM) campuses. MSU institutions developed

guidelines and procedures to assure information consistency between campuses. In addition, the transfer evaluation module on Banner is used to document transfer of credit decisions in the registrar's office. UM campuses do not use Banner in the same manner. Each UM campus documents decisions differently and uses different modules of Banner. At the community colleges other information systems were used to document transfer decisions.

Centralize Documentation of Evaluation Decisions

Student records are the responsibility of the registration and/or admission staff at each institution. The transfer process generally starts within those offices when the student submits an official transcript from another institution. Recording credits and maintaining institution transcripts is also the responsibility of the Registrar. Documenting transfer of credit decisions in the central Registrar/Admission offices would strengthen the transfer process and help alleviate time delays that can be costly to students.

Recommendation #1

We recommend the Board of Regents implement a system of controls to promote standards for student transfers throughout MUS, which include:

A. Establishing time guidelines for completing transfer of credit evaluations.

B. Clearly documenting credit transfer decisions in a centralized location.

A Lack of Management Information Limits the Regents' Decision Making Abilities

Management information is necessary to make informed decisions and provide the appropriate guidance in the transfer process. Current Regents information collected relies upon annual institutional surveys of transfer students. Although campuses have actively sought feedback from students for these surveys, limited information is gathered. Therefore, the Regents do not have the information needed to make informed decisions on unifying the transfer process throughout the MUS.

Chapter III – A System of Controls is Needed

In 2000, an evaluation of the MUS restructuring goals recommended the board "support a more systematic data collection at the system and campus level." Our current audit work still shows a low level of trend data and comparative statistics are collected. The data collected does not provide the Regents with information on the many inconsistencies that exist in the transfer of credit process. Other sources of information are available. For example, summary information on Banner for transfer activity could be regularly reviewed or systematically compiled to note trends or activities of transfer students or timeliness of reviews. Key information from those activities could be used to address future MUS operations. As two-year campuses develop different roles and offer different degrees, changes may occur in transfer trends or needed programs at the four-year campuses. The Regents could use this information to plan and manage future changes. By using trend data and comparative statistics the Regents will be able to make the necessary decisions that promote system unity as well as equity for students in the transfer process.

Recommendation #2

We recommend the Regents:

A. Periodically collect transfer data to assess system-wide policy compliance.

B. Utilize reported data to make informed decisions.

A More Centralized Approach Is Needed

As noted in the previous sections, we found the current approach de-centralized. Students cannot be confident their movement throughout the system will be consistent or predictable. Campus personnel repeatedly voiced frustration with the limited communication and coordination with other campuses. The current process does not meet the goals set forth upon restructure of the MUS, which called for a "system of unity, not merely a collection of units." Although the Regents have the authority to use its control over the MUS to create a unified transfer of credit process, we found limited steps have been completed. Policies need to be strengthened

due to the ambiguity of policy language and the lack of policy development in areas of the transfer process. The following chapter addresses policy areas where additional Regents guidance is needed.

Chapter IV - MUS Policies Should Be Clarified

Introduction

The Board of Regents (Regents) developed five policies to provide guidance for schools in the transfer of credit process. These policies include:

- Admission Requirements; out-of-state graduates
- Admission Requirements; in-state graduates
- Transfer of Credits
- General Education Block Transfer Policy
- Undergraduate Degree Requirements; associate degrees

As mentioned in the previous chapter, each institution has its own policies to direct transfer of credits. Audit work focused on Regents' policies governing the MUS transfer process as well as individual campus policies directed at transfer of credits. We conducted file reviews of transfer students noting credits transferred, reasons for credit denial and any inconsistencies in process or documentation. We interviewed registrars, transcript evaluators, deans, as well as academic and student vice presidents. The following section will discuss the inequity occurring as a result of a lack of clarity, comprehensiveness, and compliance within these various policies. This chapter will address our concerns in the following areas.

- The Regents' MUS general education core is not interpreted consistently with its original intent.
- There are wide variations in two-year degree (Community Colleges and Colleges of Technology (COT)) requirements.
- There are components in the transfer of credit process that are not addressed.

General Education Core Interpreted and Applied Differently

In policy, the Regents have mandated a fully transferable "general education core". The intent of the policy is to ensure a prescribed framework of courses that would collectively transfer throughout the MUS. In addition to the policy, general education curriculum guidelines have been developed. These Regent guidelines prescribe a specific number of credits within certain academic disciplines. We found this policy and the accompanying guidelines are not being applied or transferred as originally intended.

Chapter IV - MUS Policies Should Be Clarified

Audit work and core curricula outlined in campus catalogs shows nine MUS schools (including community colleges) do not adhere to the suggested core curriculum specifications. For example, seven units do not offer the number of required core credits for a history course. Only one school offers the general education core specifications exactly. The two charts below list the core required at each institution.

Table 1

Regents Core Requirements Versus Institution Requirements (2-Year Colleges)

Regents General Education Core	Number of Credits	Montana 2-year Community Colleges			MUS 2-year Colleges of Technology				
		Miles Community College	Dawson Community College	Flathead Valley Community College	University of Montana COT	Helena COT	Montana Tech COT	Great Falls COT	MSU-Billings COT
Natural Sciences w/ lab	6	7	6	6	6	4	6	7	7
Social Sciences	6	6	9	6	2	3	6	3	6
Mathematics	3	3	3	3	3	3	6	3	3
English Composition	3	6	8	3	6	3	6	3	6
Humanities	3	9 *	6	6	2	3	6*	3	3
**Fine Arts	3	0 **	3	3	2	3	0**	3	3
History	3	3	0	0	2	3	0	3	3
*Cultural Diversity	3	0 *	3	3	2	3	0*	3	3
Additional Core Credits Required		2	0	4	17	0	0	3	0
Total Credits	30	37	38	34	39	25	30	31	37

* Some institutions will not have a cultural diversity category, in this case credit for a courses taken under this category could be granted in a "wild card" fashion for an increase of 3 semester credits in one of the following: social sciences, history, humanities, or fine arts.

** Some participating institutions were unable to contribute a course under the fine arts or cultural diversity category. In such cases, students transferring from those institutions will only be able to transfer a maximum of 27 credits.

Source: Legislative Audit Division

Table 2

Regents Core Requirements Versus Institution Requirements (4-Year Colleges)

Regents General Education Core	Number of credits	MUS 4-year Institutions					
		University of Montana	Northern	Western	Montana Tech	Montana State University	MSU-Billings
Natural Sciences w/ lab	6	6	6	6	6	8	7
Social Sciences	6	2	6	6	6	6	6
Mathematics	3	3	3	3	6	3	3
English Composition	3	6	3	3	6	6	6
Humanities	3	2	3	6*	6*	6	3
**Fine Arts	3	2	3	0**	0**	3	3
History	3	2	3	3	0	0	3
*Cultural Diversity	3	2	3	0	0	6	3
Additional Credits Required		17	0	6	0	3	3
Total Credits	**30**	**45**	**30**	**33**	**30**	**38**	**37**

* Some institutions will not have a cultural diversity category, in this cases credit for a courses taken under this category could be granted in a "wild card" fashion for an increase of 3 semester credits in one of the following: social sciences, history, humanities, or fine arts.

** Some participating institutions were unable to contribute a course under the fine arts or cultural diversity category. In such cases, students transferring from those institutions will only be able to transfer a maximum of 27 credits.

Source: Legislative Audit Division

As noted in the charts, all but one school's general education core is comprised of the required minimum of 30 credits. In fact most schools demand more than the 30-credit minimum. The average number of credits outlined in an institution's general education core is 35. This creates difficulties for students attempting to transfer among MUS Units.

Transferring Core Requirements

Since all MUS units do not require the same number of credits within each academic discipline, equivalent courses do not apply toward the same discipline area across all units. For example, if a student has completed 25 of the required 30 credits for general core classes, upon transferring he/she cannot just "pick up" where he/she left off, in completing the Regents' general education core. In fact, the student has to meet the core requirements of the receiving

institution. The only time a student is automatically deemed to have met the Regents' core requirements is upon graduation from a two-year school. If after completing a two-year degree a student transfers to a four-year institution, the transcripts are stamped as "general education core met". We did not find this was a standard practice when students transfer between four-year institutions. A stamp on the student's transcript, verifying core requirements are met, does not necessarily mean the student has received at least 30 credits of core courses as illustrated on the charts above.

While conducting audit work, we identified an example that illustrates the inconsistencies and unpredictability that students face when transferring between MUS institutions. A student approached us with concerns on the transferability of coursework. The student's issue concerned the Regents' core requirements. A philosophy course, which had fulfilled the humanities requirement at one institution, did not fulfill the same core requirement at another four-year MUS school. Upon transfer, the equivalent philosophy course was applied toward the cultural diversity requirement. An additional course had to be taken to fulfill the humanities core requirement and then the student ended up with excess course credits in cultural diversity.

Core Requirements Should Be Clarified and Enforced

The Regents adopted a policy and general education core guidelines to establish a framework of academic courses at each unit that would transfer throughout the MUS. Each campus has developed its own interpretation of this policy and procedures for transferring general education courses. This has created inconsistencies and confusion on this policy. In addition, steps have not been taken to assure all institutions have adopted or complied with these requirements. The Regents have not monitored compliance with their policy or taken steps to address noncompliance at the units. This has impacted a student's ability to transfer within the MUS.

> **Recommendation #3**
> **We recommend the Board of Regents clarify and enforce the MUS general education core policy.**

Wide Variations Exist In Transferring Two-Year Credit Transfers

There is limited policy from the Regents regarding transfer of credit from two-year institutions. It is up to the institutions to discern which Regents' policies apply to transferred courses from two-year institutions. One Regent policy addresses two-year degrees directly. This policy delineates credit limits within each degree and defines the differences in the three two-year degrees: Associate of Science (AS), Associate of Arts (AA), and Associate of Applied Science (AAS). According to this policy both AA and AS degrees are designed to transfer to four-year institutions, whereas, an AAS is designed to "prepare individuals for employment."

Historically, colleges of technology were trade schools. In an effort to standardize MUS, the units have taken steps to offer additional academic level courses. With limited Regents' guidance, each program has developed independently resulting in programs with widely varying credits requirements and distinct differences in the transferability of seemingly similar courses.

Associate of Applied Science Degrees Subject to Wide Interpretation

Policy further allows the receiving institution to determine which courses are applicable for transfer from an AAS degree. Giving each institution such latitude in determining which courses will transfer from an AAS degree creates inequities. The following examples illustrate the wide variance in the number of credits accepted from AAS degrees within the system.

AAS Credits Submitted For Transfer	Applicable Credits Transferred
13 credits of auto technology	5 credits toward business
64 credits of e-commerce	20 credits toward business
78 credits of tourism	78 credits toward education
67 credits of business information	63 credits toward business

Chapter IV - MUS Policies Should Be Clarified

Audit work also found AAS degrees do not typically contain general education core courses. Rather these degrees are comprised of general education courses mostly on the technical level, only some of which are "college level". The table below shows the number of required credits at each unit for an AAS in computer information processing. There are variances in credits and also in the level of general education (i.e. transferable) core credits.

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Table 3

Number of Credits Required for AAS Degrees

PROGRAM	INSTITUTION	DEGREE CREDITS	CORE CREDITS
	MSU-B COT	62	0
	Tech COT	66	3
MICRO-COMPUTER/ INFORMATION PROCESSING AAS	MSUGF COT	67	6-10
	UM Helena COT	71	0
	UM Missoula COT	69	7
	Dawson CC	66	9
	MSUN	62	13
	UM Western	68	23

Source: Compiled from MUS Records

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Bachelor of Applied Science Degrees Also Create Transfer Inequities

Since the MUS reorganization, the Bachelor of Applied Science (BAS) degree has been developed. This degree is attained when a student receives an Associate of Applied Science (AAS) degree and then decides to further his/her education by getting a bachelor's degree. The BAS program is a combination of the two previously mentioned degrees. It was developed so a student could efficiently achieve a Bachelor degree after first getting an AAS degree. Since no policy defines or guides the BAS programs, each unit that offers a BAS program handles the transfer of coursework within the AAS degree differently.

We found four-year institutions approach the BAS transfers in different ways. Some campuses require formal coursework agreements for each student from the two-year institution. Other institutions have designated "tracks" or articulation agreements between the two-year and four-year campuses. We found students

who were unaware of these agreements or requirements that were required to repeat courses or were not accepted into upper level courses.

Recommendation #4
We recommend the Board of Regents develop transfer of credit policies to coordinate two-year transfer activities, specifically in relation to transfer courses from an Associate of Applied Science degree.

Criteria For Transfer Policy

Regents' transfer policy states "all college courses from regionally accredited institutions of higher education will be received and applied by all campuses of the Montana University System and the community colleges toward the free elective requirements of the Associate and Baccalaureate degrees." We found a majority of MUS campuses and community colleges complied with this policy. We found compliance with this policy to be a strength. Each campus made an effort to transfer credits toward degree or general education requirements when applicable. If courses did not apply to either of the above-mentioned areas, the course was transferred in as a general elective. Campuses also complied with the section of this policy that states remedial and developmental courses will not be accepted for transfer.

The issue noted in audit work surrounding this Regent policy was its failure to address additional components of the transfer credit process. For example, this policy does not address potential outdated courses, specify whether a student's grade point average (GPA) should be transferred along with coursework, or whether a specific grade standard exists.

Criteria for Outdated Coursework

Interviews with department faculty and registration staff found a wide range in the criteria used to evaluate whether outdated coursework would be accepted. Some disciplines, such as education, indicated no time frame of when coursework would be considered outdated. Other disciplines, such as engineering and computer

sciences, stressed the need for up-to-date coursework when returning to higher education after an extended absence.

Even within programs, time frames varied. Within the nursing programs, the age of the coursework that will be accepted varies among programs. One nursing program will not accept coursework older than three years without testing and another nursing program has no time limit on coursework. Time limits range from three-years, four-years, five-years, seven-years, to no time limit for the same credits. In this case, a student with nursing courses from five years ago would have transfer credits applied, applied only with testing, or denied depending on the MUS institution he/she decides to attend.

Cumulative Grade Point Average (GPA)

Inequities occur with overall GPA transfer as well. Most schools do not transfer or "bring forward" the student's cumulative GPA. This can be to a student's advantage as well as disadvantage. Registrar staff repeatedly told us it was to the student's benefit to be a transfer student rather than a student who completes all schooling at one campus. For example a student's file we reviewed who had a 2.3 GPA may be pleased to have a fresh start on grades, while a student whose transfer GPA was 3.88 is probably not as excited to start over on building up his/her GPA. In addition, a student who transfers to another program at the same institution does not have the option to have a fresh start like a student who transfers from another institution.

One would expect the student who has worked hard to achieve such a high GPA would like to see his/her efforts rewarded by transferring the cumulative GPA and using it as a foundation to build additional grades and overall GPA.

Inconsistent Grade Standards

All of the MUS nursing programs require a "C" grade for the transfer credits to be applied towards the degree requirements except for one institution. One institution requires a "B" grade for one nursing course in order for the transfer credits to be applied. Therefore, a transfer student with a "C" in that course would have the credit

applied or denied depending on the institution he/she transferred to. This further illustrates the inconsistencies and inequities students face as they transfer within MUS.

Academic Policies for Credit Transfer Do Not Provide Guidance Needed

To account for inadequate guidance in certain areas, campuses have developed their own policies in the transfer process, which are not necessarily consistent. Although the MUS was restructured in 1994 to an integrated system of units, Regents' policy language in this area is ambiguous and allows for a flexible interpretation and implementation of policy. The original goals of the MUS restructure were to create a "single unified system of higher education, not merely a collection of units". Regents' transfer polices do not speak to several components in the transfer of credit process. We believe the Regents should take a leadership role in promoting consistency in the transfer of credit process by strengthening their transfer of credit policies.

Recommendation #5
We recommend the Board of Regents develop policy addressing:
▸ **Criteria for outdated coursework.**
▸ **Transfer of cumulative GPA.**
▸ **Minimum course grades.**

MUS Nursing Programs Have Unique Transfer Challenges

This audit was conducted in part due to questions and concerns related to transfer of credits between MUS nursing programs. Audit findings indicated all of the review degree programs had similar issues in the areas of process controls and Regent policies. However, we found there are unique challenges to the nursing programs that require further review and more specific guidance. Our findings in this area are discussed in the next chapter.

Chapter V – Regent Leadership Needed For Nursing Transfers

Nursing Programs Present Unique Challenges

In addition to areas discussed in the previous chapters, we found Montana University System (MUS) nursing programs have unique challenges specific to the transfer of credits among their programs. Because of these challenges, nursing programs have been discussed and studied frequently. The following highlight areas studied and recommendations made within the last five years.

▸ July 1998: the Board of Regents (the Regents) accepted a report from the MUS Task Force on Nursing Education for the 21st Century. Although the Regents directed that group to implement all the recommendations, only two of six recommendations were implemented.

▸ October 1999: the Montana Initiative for Nursing Transformation (MINT) group was formed to focus on "programs that will articulate to provide maximum access with minimum duplication." One recommendation from the MINT project was to simplify and clarify nursing education models in the state to promote educational mobility and integrity. Currently only two out of four MUS registered nurse (RN) programs use the MINT articulation model.

▸ April 2002: Regents' staff recommended placing a moratorium on new nursing proposals until recommendations are implemented and articulation contracts are adopted and published for all nursing programs.

▸ August 2003: The Regents formed the Nursing Coordinating Group to discuss ongoing controversy with nursing programs. The group held regular meetings to discuss and resolve nursing issues. In the past year, these discussions have included review of the statewide articulation for nursing education situation and the MINT project, the possibility of a nursing coordinator for the MUS, distance learning to rural areas of Montana, preparation of a list of existing articulation agreements between nursing programs in the state, development of a Healthcare and Workforce Development Committee, a statewide curriculum for licensed practical nursing (LPN) programs, and whether LPN programs should all award a certificate or an associates of applied science degree. None of these issues have been completely addressed.

▸ 2004: The Regents and the Board of Nursing (BON) implemented a joint process for new nursing programs approval.

This process involves review of new nursing program proposals through the BON and through the Regents.

The on-going review of nursing programs has failed to create significant changes and improvements with nursing programs/credit transfers.

Transfer of Credits Continue to be Problematic in Nursing

Audit work focused on three nursing program levels: the LPN programs, Associate of Science Nursing (ASN) programs, and Bachelor of Science Nursing (BSN) programs. Both the ASN and BSN degrees are applicable to RN licensing. The following map illustrates the twelve MUS campuses with either a pre-nursing program or a nursing program.

Figure 6

Location of MUS Nursing Programs

Source: Legislative Audit Division

Information was gathered from nursing related committees and boards, nursing programs (both in and out of state), and nursing organizations. Audit fieldwork included:

▸ Interviewing campus personnel directly involved in the transfer of credit process or familiar with oversight of the process. The staff included registrar staff, admissions staff, provosts of academic affairs, provosts/deans/vice presidents of student affairs, transfer evaluators, advising coordinators, and department deans/directors.

▸ Reviewing a statistical sample (102) of 2003 Fall term nursing transfer student files at the admissions level and department/program level.

Of those 102 transfer students, 54 changed their major to nursing from a different major, 46 are previous nursing majors transferring to another nursing major program, and two students' previous majors could not be determined. In 50 of the 102 nursing transfer student files, we could not determine the timeliness of transfer evaluations due to lacking documentation in the files.

We did not find credit transfers between RN programs problematic. However, we found the transfer of credits between LPN programs and from LPN programs to RN programs to be inconsistent system-wide. We focused on the five Colleges of Technology (COT) that offer those programs.

Despite Standard Curriculums, LPN Transfers Are Problematic

Although interviews with MUS nursing instructors indicated major differences exist between curricula offered in LPN programs, we did not identify major differences during our review. To examine the different programs, we developed a matrix highlighting each program curriculum. The matrix below denotes the courses within each curriculum, the degrees awarded, and the minimum number of credits required in each program.

Table 4

LPN Curriculum Degrees, and Number of Credits

Similar Curriculum	MSU-Great Falls COT	UM-Missoula COT	UM-Butte Tech COT	UM-Helena COT	MSU-Billings COT
Anatomy and Physiology I & II	x	x	x	x	x
100 Level Psychology	x	x	x	x	x
Nutrition	x	x	x	x	x
Medical Terminology	x			x	x
English Composition/Writing	x	x	x	x	x
Nursing Fundamentals I & II	x	x	x	x	x
Introduction to Computers	x	x		x	x
Algebra	x	x	x	x	x*
Pharmacology I and II	x	x	x	x	x
IV Therapy	x	x	x	x	x
Mental Health	x		x	x	x
Maternal/Infant/Child Nursing	x	x	x	x	x
Adult Nursing	x	x	x	x	x
Geriatrics	x		x	x	x
Leadership in Nursing Courses	x	x	x	x	x
Medical/Surgical I & II	x				x
Lifespan Development	x	x			
Introduction to Nursing (HS)		x	x	x	x
Degree Awarded	**Transferable AAS**	**AAS**	**Certificate**	**AAS**	**AAS**
Total Minimum Required Credits	65	70	45	69	68

* Math Fundamentals or Math Computations for Health Occupations

 =Indicates areas that differ

Source: Legislative Audit Division

The curricula of the five MUS LPN programs are closely related and teach comparable content per Board of Nursing guidelines. Despite these similarities, transfer of credits does not occur as expected between LPN programs. One institution will apply another institution's credits while a second institution will not apply the same credits in the same manner towards the same degree program. The certificate level courses will not transfer to other LPN programs.

Only one LPN program (which has the same coursework and licensing requirements) transfers readily to RN programs.

Number of Credits Required in LPN Programs Also Problematic

As noted in the matrix, one program awards a certificate with a minimum of 45 credits required. Another program requires 70 credits and offers an AAS degree. This type of credit variances impact program cost for students. If a student graduates from the LPN certificate program with 45 credits and another student graduates from another LPN program with 70 credits, the first student could pay on average approximately $3000 less. The cost table below outlines the average cost of each LPN nursing programs.

Table 5

Cost Difference of LPN Programs

LPN Programs & Degree Awarded	Minimum Credits Required	Cost per Credit*		Cost of Entire Program for Tuition & Fees	
MSU-Great Falls/**AAS**	65	$	116.43	$	7,567.95
MSU-Billings COT/**AAS**	68	$	138.30	$	9,404.40
UM-Missoula COT/**AAS**	70	$	104.17	$	7,291.90
UM-Butte COT/**Certificate**	45	$	116.60	$	5,247.00
Um-Helena COT/**AAS**	69	$	113.78	$	7,850.82
Average		**$**	**117.86**	**$**	**7,472.41**

* Tuition & Fees if taking 12 credits in 2004-2005 academic year

Source: Legislative Audit Division

Transfers From LPN Programs to RN Programs Unpredictable

As noted earlier, there are also problems when transferring from an LPN program to an RN program. Only one program (MSU-Great Falls COT) has all nursing-related coursework accepted to the MSU-Bozeman RN program. This is the only program offering a "transferable" AAS degree. Although this program has lower credit requirements than three of the other LPN programs, 41 of the required 65 credits will transfer to the Bozeman RN program. The number of credits accepted from other LPN programs ranges from 0 to 12 credits.

There are also other inconsistencies throughout the MUS on how RN nursing programs accept LPN credits. In some cases there are advance placement agreements between institutions, which are specific to an institution's coursework. These agreements allow students from those programs to transfer more readily than other students. Another institution will accept four of the LPN courses if the student passes a competency test. And still another institution has no agreements in place with the other programs.

> **Conclusion: Transfer of credits between LPN programs and from LPN programs to RN programs continues to be inconsistent system-wide.**

Other States More Proactive in Addressing Consistency in LPN Transfer of Credits

We examined statute and transfer credit criteria of several states with similar aspects to Montana. These states included Oregon, New Mexico, Colorado, and Wyoming. We found LPN programs in those states have taken steps to ensure transferability is not as problematic for students as it is in Montana.

Other states have consolidated their LPN curriculum. For example, other states award the same degree for each LPN program and credit requirements do not differ widely. One state has adopted criteria to develop statewide transfer and articulation agreements. Other states require the transfer process be efficient, predictable, sensitive to student needs, and treat native and transfer students equitably. In another state, statute directs a coordinated approach be taken to related and integrated academic programs. The MUS nursing programs lack comparable transfer of credit criteria and/or transfer agreements.

Regent Leadership for Nursing Programs is Needed

Audit work noted the majority of MUS nursing transfer inconsistencies are with the design of the LPN programs and how those program credits transfer within MUS. Although all LPN students are required to take the same licensing exam and coursework for these programs is based on Board of Nursing curriculum guidelines, students still face transfer of credit inconsistencies. When one nursing program accepts LPN program

credits more readily than another institution, transfer students are not being treated equally. An LPN transfer student could benefit by advance placement in an RN program or could be penalized by having to retake comparable coursework depending on the receiving institution's requirements.

As noted earlier, various nursing studies over the years have resulted in recommendations directed towards simplifying educational mobility in the nursing programs throughout the state. Due to ongoing controversy, a lack of cooperation, and minimal enforcement these recommendations are either not implemented or implemented on a program-by-program basis and not system-wide. Collaboration has not worked among the nursing programs. Therefore, we believe the Regents should address the current design of the LPN programs. To aid in consistency among nursing programs, LPN program standardization could be developed in the areas of minimum number of credits required, type of degree awarded, and systematically fair transfer agreements.

Recommendation #6

We recommend the Board of Regents develop a transfer policy for LPN programs that at minimum standardizes:

a) **Number of credits required.**

b) **Type of degree awarded.**

c) **Program transfer agreements.**

Board of Regents Response

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December 8, 2004

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DEC 0 6 2004

LEGISLATIVE AUDIT DIV.

Scott A. Seacat
Legislative Auditor
Legislative Audit Division
P.O. Box 201705
Helena, MT 59620-1705

Dear Mr. Seacat,

I have enclosed the official response from the Montana Board of Regents, concerning the Transfer of Credit performance audit that was conducted earlier this year.

The Montana Board of Regents concurs with all of the recommendations. Members of the Board have also asked me to convey their appreciation and commendations to you and your staff for the thoughtful work and professional perspective that went into this difficult task. Members of your staff visited most of the campuses of the Montana University System, spending time with many System employees. Several of those employees have told me how positive that experience was, and how much they appreciated the care and objectivity that went into those visits.

The recommendations of this performance audit will assist the Montana University System in developing policies and procedures that treat students more equitably. It has already given the Board a significant impetus to rethink what it means by a System.

Best regards,

Sheila M. Stearns
Commissioner of Higher Education

c: The Board of Regents

MONTANA STATE UNIVERSITY — Campuses at Billings, Bozeman, Great Falls, and Havre
THE UNIVERSITY OF MONTANA — Campuses at Butte, Dillon, Helena, and Missoula
Dawson Community College (Glendive) — Flathead Valley Community College (Kalispell) — Miles Community College (Miles City)

MONTANA BOARD OF REGENTS OF HIGHER EDUCATION
MONTANA UNIVERSITY SYSTEM
RESPONSE TO TRANSFER OF CREDIT
PERFORMANCE AUDIT REPORT
December 8, 2004

This document represents the Montana Board of Regents' response to the performance audit report, dated December, 2004, concerning transfer of credits. The Board concurs with the recommendations set out in the audit, and has established a timeline for compliance with the recommendations, with some cautions. That timeline is based on the current six-meetings-a year schedule adopted by the Board of Regents. If the Board decides to meet on a less frequent basis, the timelines may be extended. The details are as follows:

Recommendation 1. **We recommend the Board of Regents implement a system of controls to promote standards for student transfers throughout MUS, which include:**
   a) **Establishing time guidelines for completing transfer of credit evaluations.**
   b) **Clearly documenting credit transfer decisions in a centralized location.**

Response: **Concur.** The system of controls will be in place on all campuses of the Montana University System by September 2005.

Recommendation 2. **We recommend the Regents:**
   a) **Periodically collect transfer data to assess system-wide policy compliance.**
   b) **Use reported data to make informed decisions.**

Response: **Concur.** Assessment procedures will be included in each of the policy and program revisions described in this report, as they are implemented by the Board. The Board has also recommended the addition of an institutional research position to the staff of the Office of the Commissioner of Higher Education. That staff person would be responsible for implementation of this recommendation.

Recommendation 3. **We recommend the Board of Regents clarify and enforce the MUS general education core policy.**

Response: **Concur.** The Board of Regents intend to complete this review and clarification by January 2006. Campuses throughout the Montana University System may have to revise some parts of their general education programs, based on the Regents' review. Those revisions will be completed by August 2006.

Recommendation 4. **We recommend the Board of Regents develop transfer of credit policies to coordinate two-year transfer activities, specifically in relation to transfer courses from an Associate of Applied Science degree.**

Response: **Concur.** This recommendation will almost certainly require the most discussion on the part of the Board, since it requires a complete review of the purpose and philosophy of Associate of Applied Science degrees. Work on this recommendation will be completed by January 2006.

Recommendation 5. We recommend the Board of Regents develop policy addressing:
  a) Criteria for outdated coursework.
  b) Transfer of cumulative GPA.
  c) Minimum course grades.

Response: **Concur.** The policies described above will be in place by January 2006.

Recommendation 6. We recommend the Board of Regents develop a transfer policy for LPN programs that at a minimum standardizes:
  a) Number of credits required.
  b) Type of degrees awarded.
  c) Program transfer agreements.

Response: **Concur.** The Board of Regents has already authorized this project, and the directors of LPN nursing programs in the Montana University System have already met to develop a work plan. The policy will be completed by the start of the school year in September 2005. LPN programs throughout the University System may have to modify their individual curriculum, based on the policy approved by the Board of Regents. Those campus curriculum revisions will be completed by June 2006. Work on this policy could be delayed by an initiative recently adopted by the State Board of Nursing, which entails a review and possible revision of LPN practice rules established by the Board. That review may require additional skill sets and training for LPN nurses; and if that happens, LPN educational programs in the Montana University System will have to be modified to reflect those new State Board of Nursing expectations. Staff in the Office of the Commissioner of Higher Education and at the State Board of Nursing are already working to coordinate the two LPN nursing projects.